

FLASTER GREENBERG, PC

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f/k/a/ Phelan Hallinan & Diamond, PC

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JERRY K. WONG, on behalf of himself and
all others similarly situated,

Plaintiff/Counterclaim Defendant,

,

v.

PHELAN, HALLINAN & DIAMOND, PC,

Defendant/Counterclaimant,

and

GREEN TREE SERVING, LLC,

Defendant.

Case No. 2:14-cv-03252-ES-JAD

**CERTIFICATION OF KENNETH GOODKIND, ESQUIRE IN SUPPORT OF
ENTRY OF DEFAULT AS TO PLAINTIFF/COUNTERCLAIM
DEFENDANT JERRY K. WONG**

I, Kenneth Goodkind, being of full age, do hereby certify as follows:

1. I am an attorney-at-law in the State of New Jersey and a shareholder with the firm of Flaster/Greenberg P.C. I have personal knowledge of the facts contained in this Certification and am responsible for the representation of Defendant/Counterclaimant Phelan Hallinan Diamond & Jones, PC ("Phelan") in this matter.

2. Phelan's Amended Answer with (i) Defenses and (ii) Counterclaim for Attorney's Fees for Bad Faith Filing and Harassment under 15 U.S.C. § 1692k(a)(3) in this matter was served by filing this pleading as ECF No. 44 on March 8, 2016.

3. The time within which Plaintiff/Counterclaim Defendant Jerry K. Wong may answer or otherwise move as to Phelan's Counterclaim expired on or before March 29, 2016 and has not been extended or enlarged.

4. As of the date hereof, Plaintiff/Counterclaim Defendant Jerry K. Wong has failed to file an Answer to Phelan's Counterclaim.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 4, 2016

/s/ Kenneth S. Goodkind
Kenneth S. Goodkind